BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2001

Docket No. R2001-1

OFFICE OF THE CONSUMER ADVOCATE MOTION FOR LEAVE TO FILE ERRATA TO MOTION TO COMPEL RESPONSES TO INTERROGATORIES OCA/USPS-231-233, 243, 245-47, AND 239-42, 244, 248-53 (December 18, 2001)

Pursuant to Rule 21 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate (OCA) hereby moves for leave to file minor revisions to a "Motion to Compel Responses to Interrogatories OCA/USPS-231-233, 243, 245-47, and 239-42, 244, 248-53," filed December 17, 2001. Upon reviewing the captioned Motion to Compel, undersigned counsel became aware that an attachment containing notes of a telephone conversation had been left off the filed document; a revision of the Declaration of Shelley S. Dreifuss attached to the pleading was required; and several additional errors in the pleading were spotted. While these errors are minor, they could cause confusion. Consequently, a revised Motion to Compel is being filed today. Changes have been highlighted in a bold font to make them easy to spot. Deletions are noted with brackets.

Wherefore, OCA respectfully requests that its revised Motion to Compel Responses to Interrogatories OCA/USPS-231-233, 243, 245-47, and 239-42, 244, 248-53 be accepted.

Respectfully submitted,

Helley S. Preifuss Shelley S. Dreifuss

Acting Director

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 of the rules of practice.

Shelley A. Dreifuso Shelley S. Dreifuso

Washington, D.C. 20268-0001

December 18, 2001